

1 William B. Abrams  
2 end2endeconsulting@gmail.com  
3 2041 Stagecoach Rd.  
4 Santa Rosa, CA, 95404  
5 Tel: 707 397 5727

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities  
7 Commission and the California Office of Energy Infrastructure Safety*

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9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 In re:

13 PG&E CORPORATION,

14 -and-

15 PACIFIC GAS AND ELECTRIC  
16 COMPANY,

17 Debtors.

18

19  Affects PG&E Corporation  
20  Affects Pacific Gas and Electric Company  
21  Affects both Debtors

22

23 \* *All papers shall be filed in the lead case,  
24 No. 19-30088 (DM)*

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26 Bankr. Case No. 19-30088 (DM)  
27 Chapter 11  
28 (Lead Case)  
(Jointly Administrated)

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30 **SUPPLEMENTAL STATEMENT IN  
31 SUPPORT OF THE MOTION OF  
32 WILLIAM B. ABRAMS PURSUANT  
33 TO FEDERAL RULE OF  
34 BANKRUPTCY PROCEDURE 2004  
35 FOR ENTRY OF AN ORDER  
36 AUTHORIZING DISCOVERY AND  
37 HEARINGS REGARDING THE ACTS  
38 AND CONDUCT OF JAMS  
39 NEUTRALS GIVEN NEW EVIDENCE**

40

41 Related to:

42 Dkt. 12766, 13035, 13036, 13039

## **STATEMENT**

On August 18, 2022 Abrams filed the “Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an Order Authorizing Discovery and Hearings Regarding the Acts and Conduct of JAMS Neutrals Given New Evidence” [Dkt.12766] (the “**Motion**” or “**Motion for JAMS Discovery**”). Objections to this Motion were filed on September 3, 2022 by the Fire Victim Trustee [Dkt. 13035], Steven J. Skikos Esq. [Dkt. 13036] and Former Trustee John K. Trotter [Dkt. 13039].

The Order setting the schedule for this Motion was issued on September 13, 2022 and states the following:

*“Hearing Held. Movant William Abrams appeared. David Molton appeared for Fire Victim Trust and Cathy Yanni as Trustee of FVT. Matthew French appeared for fire claimants Majesti Mai Bagorio, et al. The FVT shall file a response to the motion by 10/3/22. The matter will then stand submitted. (related document(s): [12766](#) Motion for Examination filed by William B. Abrams)”*

Although, Ms. Yanni did not follow a similar order by filing the “*Letter to Honorable Judge Dennis Montali and Certificate of Service*” [Dkt. 12623], I feel bound by this Order and will not provide further briefing at this point. However, I do feel it is important for the Court and parties to be aware that I very much want to respond to the false statements and unfounded character assaults contained within these objections. I hope that the Court will afford me the opportunity to reply before passing judgement and ruling on this Motion for JAMS Discovery.

Executed on October 5, 2022, at Santa Rosa, CA.

Respectfully submitted,

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William B. Abrams  
Pro Se Claimant